

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

JILLIAN HARROD, individually and heir to	§	
the estate of JUSTIN HARROD	§	
Plaintiff,	§	
v.	§	Case No. 1:24-cv-388
	§	
LLANO COUNTY, TEXAS, BILL	§	
BLACKBURN, BYRON CERVANTEZ,	§	
AND RANDY SHAW	§	
Defendants.	§	
	§	

**PLAINTIFF’S OPPOSED MOTION FOR LEAVE TO FILE HER FIRST AMENDED
COMPLAINT**

TO THE HONORABLE JUDGE OF SAID COURT:

Plaintiff Jillian Harrod respectfully moves the Court, pursuant to Federal Rule of Civil Procedure 15, for leave to file her First Amended Complaint, and in support thereof shows the following:

1. Plaintiff first brought this suit on April 11, 2024, against Llano County Sheriff’s Office (LCSO), Llano County, Texas, Sheriff Bill Blackburn, Individually and as Sheriff of the Llano County Sheriff’s Office, Deputy Byron Cervantez, and Deputy “Ty” Shaw.
2. On June 5, 2024, all Defendants answered, except for Llano County Sheriff’s Office, which filed a Motion to Dismiss.
3. Plaintiff dropped its claim against Llano County Sheriff’s Office. The First Amended Complaint reflects this change and is attached to this motion.
4. Plaintiff adds Deputy Travis Glosson, as he is one of the deputies who used force against Mr. Harrod.

5. Counsel for the Parties conferred on October 18, 2024, and Defendants oppose this motion. Plaintiffs' counsel shared this motion and the first amended complaint with Defendants' counsel. Defendants' counsel opposed the addition of Deputy Glosson to the lawsuit. Therefore, pursuant to Local Rule CV-7G, this Motion is opposed.

WHEREFORE, Plaintiff requests that the Court grant leave to file and serve the proposed first amended complaint, attached as Exhibit "A", and deemed it filed as of October 21, 2024.

Respectfully submitted,

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COUNSEL FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on October 21, 2024, I electronically filed the foregoing document with the Clerk of the Court using the TXW CM/ECF system, which will send notification of such filing to all attorneys of record.

/s/ Austin Kaplan